

U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street, 3rd floor
New York, New York 10007

MEMO ENDORSED

October 9, 2012

USDS SDNY DOCUMENT ELECTRONICALLY FILED FDC# _____ DATE FILED: 10-9-12
--

BY FAX

The Honorable P. Kevin Castel
United States District Judge
United States District Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: *IRAP v. U.S. Dep't of Homeland Security*, 12 Civ. 3461 (PKC)

Dear Judge Castel:

I write on behalf of both parties to respectfully request a one-month adjournment of the conference that is currently scheduled for tomorrow, October 10, 2012, at 12:30pm. Since our initial conference before the Court, the parties have been actively negotiating a stipulation of settlement. However, the parties require additional time to complete these negotiations. This is our first request for an adjournment of this conference, and both parties consent to this adjournment.

I apologize in advance for not providing the required 48 hours-notice for adjournment of this conference. We are still available to appear before the Court tomorrow at 12:30, but an adjournment would allow us to finalize our agreement so that we can provide a substantive update to Your Honor when we next appear before you.

Conference Adjourned

From: October 10, 2012
To: Nov. 14, 2012 at 12:00 p.m.

SO ORDERED:


P. KEVIN CASTEL, U.S.D.J.

Date: 10-9-12

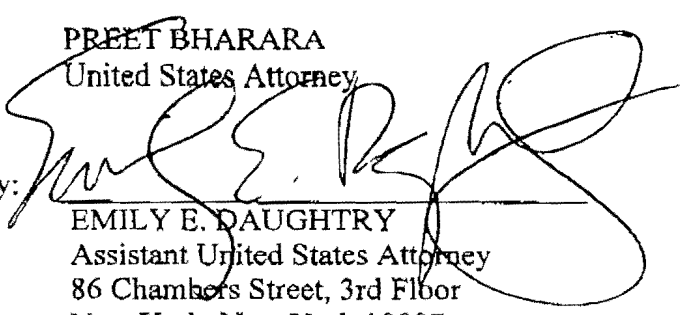
Page 2

We thank the Court for its consideration of this request.

Respectfully,

PREET BHARARA
United States Attorney

By:



EMILY E. DAUGHTRY
Assistant United States Attorney
86 Chambers Street, 3rd Floor
New York, New York 10007
Tel.: (212) 637-2777
Fax : (212) 637-2717

cc: (via email)

David Brown
Morrison & Foerster LLP
1290 Avenue of the Americas
New York, NY 10104-0050
E-mail: Dbrown@mofa.com
Attorney for Plaintiff